

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE: TERRORIST ATTACKS ON :
SEPTEMBER 11, 2001 : **MDL 03-1570 (GBD)(SN)**

This Document Relates To:

Havlish, et al. v. bin Laden, et al., Case No. 03-CV-09848
Ashton, et al. v. al Qaeda Islamic Army, et al., Case No. 02-CV-06977
Burnett, Sr., et al., v. Islamic Republic of Iran, Case No. 15-CV-9903
Burlingame, et al. v. bin Laden, et al., Case No. 02-CV-07230
Bauer, et al. v. al Qaeda Islamic Army, et al., Case No. 02-CV-07236
O'Neill, Sr., et al. v. Republic of Iraq, et al., Case No. 04-CV-1076
Federal Insurance Co., et al. v. al Qaida, et al., Case No. 03-CV-06978

All other cases asserting claims against the Islamic Republic of Iran

**HAVLISH PLAINTIFFS' PROPOSED DISCOVERY REQUESTS
ADDRESSED TO ALL COUNSEL REPRESENTING PLAINTIFFS
WHO HAVE OBTAINED JUDGMENTS AGAINST IRAN**

The *Havlish* Plaintiffs, by and through their counsel, present the following Interrogatories to counsel in each MDL action in which Plaintiffs have asserted claims against the Islamic Republic of Iran ("Iran"). These discovery requests are propounded in furtherance of the Court's Opinion and Order of September 30, 2019 (Doc. 5180). Please respond to each discovery request in accordance with the Federal Rules of Civil Procedure.

DEFINITIONS

1. "You" and "your" refer to any counsel representing Plaintiffs who have asserted claims against the Iran in an action pending in this MDL.
2. "USVSST Fund" means the United States Victims of State Sponsored Terrorism Fund referenced in your Motion for Reconsideration.
3. "Iran" means the Islamic Republic of Iran and any entity that the Court has determined to be an "agency" or "instrumentality" of Iran for the purpose of establishing liability under the

Foreign Sovereign Immunities Act.

DISCOVERY REQUESTS

1. For each of your clients who has been awarded a judgment against Iran, please state the following:

- (a) the name of the client;
- (b) the caption of the case in which the client's claim against Iran was filed;
- (c) whether the client has submitted an application with the USVSST Fund;
- (d) whether the client has received an award from the USVSST Fund;
- (e) the date(s) of each client's award;
- (f) the amount(s) of each client's award; and
- (g) the amount of attorney fees paid or due to be paid from the award; and
- (h) if the USVSST Fund Special Master has authorized a payment that the client has not yet received, the amount of that authorized payment.

Date: _____

/s/ Timothy B. Fleming
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